

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LOYALTY CONVERSION SYSTEMS
CORPORATION

Plaintiff,

v.

AMERICAN AIRLINES, INC., ET AL.

Defendants.

§
§
§
§
§
§
§
§
§
§

Case No. 2:13-CV-655-JRG
(LEAD CASE)

Jury Trial Demanded

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE SUR-REPLY TO DEFENDANTS’ RESPONSE TO
PLAINTIFF’S OPPOSITION TO MOTION TO STAY**

Plaintiff Loyalty Conversion Systems Corporation (“Loyalty Conversion”) hereby respectfully moves for an extension of time to file a Sur-reply to Defendants Delta Air Lines, Inc., Frontier Airlines, Inc., United Airlines, Inc., US Airways, Inc., American Airlines, Inc., Southwest Airlines Co., and Spirit Airlines, Inc. (collectively “Defendants”) Response to Plaintiff’s Opposition to Defendants’ Motion to Stay filed on May 5, 2014 [Doc. No. 72] (the “Motion”). In support thereof, Plaintiff would show the Court the following:

Loyalty Conversion’s Sur-reply to the Motion is currently due on May 15, 2014. The present Motion requests an extension until and including May 22, 2014. Counsel for the parties have conferred with respect to this Motion, and counsel for Defendants have indicated Defendants are unopposed to the relief sought in this Motion. The extension is not sought for purposes of delay but so that justice may be done.

Dated: May 15, 2014

Respectfully submitted,

By: /s/ Andrew G. DiNovo

Andrew G. DiNovo
Texas State Bar No. 00790594
Jay D. Ellwanger
Texas State Bar No. 24036522
Adam G. Price
Texas State Bar No. 24027750
DiNovo Price Ellwanger & Hardy LLP
7000 N. MoPac Expressway, Suite 350
Austin, Texas 78731
Telephone: (512) 539-2626
Facsimile: (512) 539-2627

ATTORNEYS FOR PLAINTIFF
LOYALTY CONVERSION SYSTEMS
CORPORATION

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h), and that Defendants are unopposed to the foregoing motion.

/s/ John D. Saba

John D. Saba

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel, who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 15th day of May 2014.

/s/ Andrew G. DiNovo

Andrew G. DiNovo